

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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KRISTOPHER R. OLSON, :  
CHRISTOPHER LOPEZ, WARREN :  
BARBER, CHRISTOPHER CLIFFORD :  
and ERIK LIPTAK, :  
: Plaintiffs, :  
v. : : 20 Civ. 632 (JSR)  
: :  
MAJOR LEAGUE BASEBALL; MLB :  
ADVANCED MEDIA, L.P.; HOUSTON :  
ASTROS, LLC; and BOSTON RED SOX :  
BASEBALL CLUB, LP, :  
: Defendants.  
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**DEFENDANT MAJOR LEAGUE BASEBALL'S  
NOTICE OF MOTION FOR A PROTECTIVE ORDER**

**PLEASE TAKE NOTICE** that upon the accompanying (i) Memorandum of Law, (ii) Declaration of Bryan Seeley, and (iii) Declaration of John L. Hardiman and the exhibits thereto, the undersigned Defendant Major League Baseball moves this Court, before the Honorable Jed S. Rakoff, at the Daniel Patrick Moynihan United States Courthouse, Courtroom 14B, 500 Pearl Street, New York, New York for a protective order under Rule 26(c) of the Federal Rules of Civil Procedure, and for such other and further relief as the Court deems just and proper.

Pursuant to the Court's instruction during the Parties' joint conference call with the Court on March 25, 2020, Plaintiffs shall file any opposition to this motion by April 3, 2020. Defendants understand that the Court will instruct the parties if it decides oral argument is necessary or appropriate.

Dated: March 30, 2020  
New York, New York

Respectfully submitted,

/s/ John L. Hardiman  
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